

January 29, 2019

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street SW
Washington, DC 20554

Re: Suicide Hotline Improvement Act of 2018, WC Docket No. 18-336

Dear Ms. Dortch,

NCTA – The Internet & Television Association (“NCTA”) submits this letter to supplement the record in response to the Public Notice issued by the Wireline Competition Bureau in the above-referenced proceeding.¹

The National Suicide Hotline Improvement Act of 2018 (NSHIA) directs the Commission to conduct a study examining the feasibility of designating a three-digit dialing code to be used for a national suicide prevention and mental health crisis hotline system and to produce a report no later than August 14, 2019.² In particular, the report must recommend “whether a particular N11 dialing code or simple, easy-to-remember, 3-digit dial code should be used.”³

NCTA supports the goal of the NSHIA to establish a three-digit dialing code that can be used for a suicide prevention and mental health hotline system. There are, however, challenges associated with the use of an N11 code for this purpose. The comments submitted by ATIS describe the existing uses of the eight N11 codes that are authorized for use. As noted by ATIS, many service providers, including many NCTA members, use the 611 code for customer repair service.⁴ If the Commission were to repurpose one of the eight N11 codes for a different use, ATIS explains that “there will be a need for more significant customer education and outreach efforts because both the current users and new users of the code would need to be educated.”⁵

One particularly relevant factor in considering whether to designate an existing N11 number, and which one to designate, is the level of usage of such numbers. The more heavily used a number is today, the greater the consumer education and outreach that will be necessary

¹ See *Wireline Competition Bureau Invites Comments on Implementation of the National Suicide Hotline Improvement Act of 2018*, Public Notice, WC Docket No. 18-336, DA 18-1148 (rel. Nov. 8, 2018) (*Notice*).

² National Suicide Hotline Improvement Act of 2018, Pub. L. No. 115-233, H.R. 2345 (2018).

³ *Notice* at 1.

⁴ ATIS Comments at 4.

⁵ *Id.* at 3.

to ensure that callers seeking the number for its former purpose do not interfere with the efficient use of the number for its new purpose. To assist the Commission in assessing this challenge, NCTA gathered data from its three largest members on the usage of particular N11 numbers. The chart below shows the combined usage of these three companies for four different N11 numbers for October and November of 2018:

N11 Code	Calling Volume
211	369,044
311	263,935
511	92,196
611	556,879

This snapshot of N11 number usage confirms the point made by ATIS that repurposing one of these existing numbers would present a complicated challenge in terms of consumer education and outreach. In particular, the usage data demonstrate that repurposing the 611 code would require more significant outreach and consumer education than some other N11 codes. Given the challenges associated with repurposing any N11 code, and especially the 611 code, the Commission should give serious consideration to the proposal by ATIS to use a new non-N11 code.

Respectfully submitted,

/s/ Steven F. Morris

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